

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF
HOMELAND SECURITY, *et al.*,

Defendants.

No. 6:24-cv-000306

CONSENT MOTION FOR LEAVE TO FILE AMICUS BRIEF

American Families United (AFU), by and through the undersigned counsel, Lisa Graybill, respectfully requests the Court's leave to file the attached amicus curiae brief in support of Defendants' Motion for Summary Judgment. The proposed amicus brief offers a perspective that differs from that of the parties, drawn from the real life experiences of both U.S. citizen and noncitizen family members who will be directly impacted by the outcome of this case and will assist the Court's consideration of the factors for granting summary judgment, particularly the factors concerning Texas's alleged irreparable harm and the public benefits of keeping families together. All parties to this case have consented to the timely filing of American Families United's brief as amicus curiae.

For the foregoing reasons, American Families United respectfully requests that the Court grant this motion for leave to participate as amicus curiae and accept the proposed amicus brief. A proposed order is attached.

Dated: October 25, 2024

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I hereby certify that counsel for *Amicus Curiae* have complied with the meet and confer requirements of Local Rule CV-7(h). The parties consent to the filing of this motion.

/s/ Lisa S. Graybill
Lisa S. Graybill

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that, on October 25, 2024, I electronically filed the above and foregoing document using the CM/ECF system, which automatically sends notice and a copy of the filing to all counsel of record.

/s/ Lisa S. Graybill
Lisa S. Graybill